Anti-bribery & Corruption Framework

The operational framework of Alpha Bank Group (herein after “the Group”) abides with the applicable laws, rules, regulations and the highest ethical standards, forming an essential element of responsibility towards its Stakeholders, so that the reputation and long-term success of the business is safeguarded.

The Group has a zero-tolerance approach towards bribery and corruption. To this end, the following principles apply:

- Adopt all legal requirements necessary to instill a strong anti-bribery and corruption environment.
- Strongly prevent bribes, given directly or indirectly on the Group’s behalf, to gain a business advantage.
- Strongly prevent bribes or agreeing to them being accepted on the Group’s behalf, to influence business.
- Take all necessary action for sustaining Employees’ ongoing awareness with the principles of the Policy.

The Policy applies to all activities and operations of the Group. Indicatively, the Policy is addressed to the following persons:

- The Members of the Board of Directors of the Bank and of the Group Companies (SPVs included)
- The General Managers, Senior Executives and Employees of the Group
- Third Parties goods and/or service providers of the Group
- Advisers of the Bank and the Group
- Customers of the Group.

The Group Employees, Suppliers and Customers are strictly prohibited from offering, paying, promising, or authorizing any payment, inducement or any kind of value, to any person, directly or indirectly, through or to a third party, for the purpose of (i.e., in exchange for):

- causing the person to act or fail to act in violation of a legal duty
- causing the person to abuse or misuse their position or
- securing an improper advantage, contract or concession.

The Group Employees, in addition to the above, are strictly prohibited from:

- receiving any payment, inducement of any kind or service or benefits of any nature that could compromise their professional judgment.
- taking action in order to circumvent controls in place to prevent bribery.

The Group ensures compliance of the above through implementing adequate procedures relevant to the type of the Bank’s business, which are adjusted accordingly to the type of business of each Group Company. The procedures are reviewed regularly in order to ensure appropriateness.